

EXHIBIT A

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RASIER, LLC; and RASIER-CA, LLC

[Additional Counsel Listed on Signature Page]

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

IN RE: UBER TECHNOLOGIES, INC.,
PASSENGER SEXUAL ASSAULT
LITIGATION

Case No. 3:23-md-03084-CRB

**DECLARATION OF SCOTT BINNINGS
IN SUPPORT OF DEFENDANTS'
MARCH 28, 2025 BRIEF PURSUANT TO
SPECIAL MASTER ORDER NO. 3, § I (4)**

This Document Relates to:

ALL ACTIONS

DECLARATION OF SCOTT BINNINGS


I, Scott Binnings, having personal knowledge of the following state:

1. I am the Associate General Counsel, Safety and Core Services, at Uber. I was first employed by Uber in April 2015 and have worked as in-house legal counsel for the past 9 years. My previous positions included Senior Counsel, Regulatory; Senior Counsel, Safety; Legal Director, Safety; Senior Legal Director, Safety; and Senior Legal Director, Safety, Payments, and Risk. In my current role, as has been the case throughout my tenure at Uber, I am responsible for providing legal advice to Uber's leadership and employees related to safety issues, procedures, and policy, among other legal advice. I offer this Declaration in the above-captioned matter in support of Defendants Uber Technologies, Inc., Rasier, LLC, and Rasier-CA, LLC's March 28, 2025 brief pursuant to Special Master Order No. 3, § I(4) (ECF 2472). The facts set forth herein are true and correct and are based on my own personal knowledge, and I could and would competently testify thereto if called.

2. I am familiar with the document identified on the privilege log as JCCP_MDL_PRIVLOG072166. It is a confidential draft Excel spreadsheet dated May 29, 2020 documenting a Risk Register for various jurisdictions. The spreadsheet is marked "Attorney-Client Privileged-Prepared at the Advice of Counsel." It is also marked as a Work in Progress and contains a note not to circulate it. Then-Global Senior Counsel, Safety, Amos Davis and I requested the risk assessment reflected in the spreadsheet to facilitate our provision of legal advice concerning various aspects of platform safety, including the regulatory, litigation, insurance, and compliance risks advised on by the legal team. This document was created at my direction and the direction of Mr. Davis for the purpose of obtaining and providing our legal advice concerning safety issues. This draft spreadsheet was shared with us for that purpose. Moreover, the spreadsheet contains several comments reflecting Mr. Davis' legal advice.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on March 27, 2025.

By:  _____

Scott Binnings